

The Honorable Marsh J. Pechman

UNITED STATES DISTRICT COURT OF WASHINGTON
AT WESTERN DISTRICT SEATTLE

JULIE DALESSIO, an individual,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON, et. al.

Defendants.

No. 2:17-cv-00642 MJP

DEFENDANTS' SECOND
SUPPLEMENTAL INITIAL
DISCLOSURES

COME NOW DEFENDANTS, by and through counsel of record Special Assistant Attorney General Jayne L. Freeman and make the following Second Supplemental Initial disclosures required by Federal Rule of Civil Procedure 26(a)(1) based on information available to Defendants to date. Defendants reserve the right to supplement this initial disclosure as discovery is conducted and disclosures are made by Plaintiff.

I. RULE 26(A)(1)(A)(I) THE NAME AND, IF KNOWN, THE ADDRESS AND TELEPHONE NUMBER OF EACH INDIVIDUAL LIKELY TO HAVE DISCOVERABLE INFORMATION—ALONG WITH THE SUBJECTS OF THAT INFORMATION—THAT THE DISCLOSING PARTY MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES, UNLESS THE USE WOULD BE SOLELY FOR IMPEACHMENT.

The following individuals are likely to have discoverable information, which Defendant may use to support its claims or defenses. Disclosure of various individuals does not reflect Defendants agreement as to whether certain information, evidence, or issues are actually relevant or material to claims or theories as advanced by Plaintiff or defenses necessary to respond to said claims. Defendants reserve the right to object to

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PHONE: (206) 623-8861
FAX: (206) 223-9423

1 discovery related to matters outside the scope of FRCP 26, or immaterial to legal defenses
2 and arguments upon which Defendants may rely to defend against claims and theories set
3 forth in Plaintiff's First Amended Complaint.

- 4 1. Alison Swenson, Compliance Analyst (since July 2014)
5 c/o Keating, Bucklin & McCormack, Inc., P.S.
6 800 5th Avenue, Suite 4141
7 Seattle, WA 98104
8 206.623.8861

9 Ms. Swenson prepared the responses to public records requests cited by Plaintiff in
10 her Complaint. She has knowledge of the redaction process and the facts regarding the
11 public records productions at issue in this case and communications with Plaintiff.

- 12 • Ms. Swenson sent out search requests for responsive records and prepared a
13 response to PRR-16-00283. See, UW001982-UW00183, UW000779-
14 UW000787, UW00194-UW00185, UW001991-UW002000.
- 15 • Ms. Swensen sent out search requests for records responsive to PRR-2015-
16 00570 and prepared responsive records and an exemption log for documents
17 withheld. See, UW00004-UW000392, UW002001-0020131,

- 18 2. Julie Dalessio
19 1110 29th Ave.
20 Seattle, WA 98122
21 (206) 324-2590

22 Ms. Dalessio is the plaintiff in this case and has knowledge of facts regarding the
23 allegations in her Complaint.

- 24 3. Robert Kosin, Assistant Attorney General
25 University of Washington Attorney General's Office
26 c/o Keating, Bucklin & McCormack, Inc., P.S.
27 800 5th Avenue, Suite 4141
Seattle, WA 98104
206.623.8861

Mr. Kosin has knowledge of regarding a contact with Plaintiff in 2016. Mr. Kosin

1 may also have knowledge of privileged attorney client communications and/or work
2 product. By disclosing AAG Kosin as an individual with knowledge of some non-
3 privileged information, the University does not in any way intend to waive any applicable
4 privileges that may apply.

- 5 4. David Betz
6 1325 4th Avenue Suite 1400
7 Seattle, WA 98101-2573
8 (206) 457-4121

9 Mr. Betz has knowledge of facts regarding a public records request he made to the
10 University of Washington, and the adverse possession lawsuit regarding which Plaintiff
11 alleges some of her damages arise.

- 12 5. Perry Tapper
13 Public Records Compliance Officer (Since September 2013)
14 Office of Public Records and Open Public Meetings
15 c/o Keating, Bucklin & McCormack, Inc., P.S.
16 800 5th Avenue, Suite 4141
17 Seattle, WA 98104
18 206.623.8861

19 Mr. Tapper has knowledge of Plaintiff's contact with the Office of Public Records.

- 20 6. Eliza Saunders
21 Director of the Office of Public Records (Since September 2013)
22 Office of Public Records and Open Public Meetings
23 c/o Keating, Bucklin & McCormack, Inc., P.S.
24 800 5th Avenue, Suite 4141
25 Seattle, WA 98104
26 206.623.8861

27 Ms. Saunders has knowledge of the University's Public Records Office operations,
policies, and procedures.

7. Barb Benson
Records Management Services (Since July 2013)
c/o Keating, Bucklin & McCormack, Inc., P.S.
800 5th Avenue, Suite 4141
Seattle, WA 98104
206.623.8861

Ms. Benson has knowledge regarding records retention policies at the University of

1 Washington.

2 8. Lumilla Barbacar, Civil Rights Investigator
3 Washington State Human Rights Commission
4 711 South Capitol Way, Suite 402
5 P.O. Box 42490
6 Olympia, WA 98504-2490
7 (360) 359-4921

8 Ms. Barbacar has knowledge regarding a complaint Plaintiff filed with the Human
9 Rights Commission in 2016 and communications with Plaintiff regarding it.

10 9. Laura Skinner, Executive Asst. to the Commissioners
11 Washington State Human Rights Commission
12 711 South Capitol Way, Suite 402
13 P.O. Box 42490
14 Olympia, WA 98504-2490
15 (360)359-4921

16 Ms. Skinner has knowledge regarding a petition for reconsideration filed with the
17 Human Rights Commission by Plaintiff and communications with Plaintiff.

18 10. Andrew Palmer
19 Compliance Analyst (since June 2015)
20 c/o Keating, Bucklin & McCormack, Inc., P.S.
21 800 5th Avenue, Suite 4141
22 Seattle, WA 98104
23 206.623.8861

24 Mr. Palmer processed Pr-2016-00760 (Ms. Dalessio's request for her own records)
25 and collected and produced documents to Ms. Dalessio. See, UW002032-002454,
26 UW00788-UW001936.

27 11. Ana Marie Keeney
Human Resources Consultant (since July 2013)
c/o Keating, Bucklin & McCormack, Inc., P.S.
800 5th Avenue, Suite 4141
Seattle, WA 98104
206.623.8861

Ms. Keeney located copies of notice of charge and from the Washington State

Human Rights Commission (WSHRC) sent to UW HR in 2016 regarding Plaintiff's complaints WSHRC #17EZ-0220-16-7/EEOC #38G-2017-00020 and the Commission's final action finding no jurisdiction and related documents sent in 2016-2017. UW002966-UW00304.

12. Patty Van Velsir
Former Human Resources Consultant (retired 2017)
Last Known Address: 527 E. Princeton Ave
Fresno, CA 93704

Ms. Van Velsir may have been copied on some public records search requests.

13. Amy Robles
Compliance Analyst (since December 2016)
akrobles@uw.edu

Box 356480
1705 NE Pacific St
Seattle, WA 98195
206 221-1742

Ms. Robles uploaded records responsive to PR-2016-00760 (Dalessio) to the public records office on or about December 22, 2016 in response to a request from public records analyst Andrew Palmer. UW002395-UW002399.

Records reflect Ms. Robles received additional records that Ms. Holloway located when she was clearing out her office the last time upon retirement and forwarded on December 16, 2016. UW00265-UW002299.

Ms. Robles uploaded a second installment of records responsive to PR-2016-00760 on or about January 6, 2017 to the public records office. See, UW002421-UW002422. Records reflect Ms. Robles obtained authorization for public records to request a snapshot of Rhoda Ashley Morrow's email account. UW002409-UW002414.

14. Jeanie Miele
Former Compliance Analyst (February 2014-October 2015)
Last known address:
1024 5th Ave. S. Apt. B303
Edmonds, WA 98020-4088

Records reflect that Ms. Meile received a request to locate records responsive to PR-2015-00570 that Alison Swenson from public records sent September 16, 2015. Ms. Miele searched for a departmental representative who may be able to locate a Lab Medicine

department file for Plaintiff. On September 17, 2015, Karen Holloway reported to Ms. Miele that she submitted the request to a Program Coordinator (presumably Matt Maria) so the records could be retrieved from storage in archives. On September 25, 2015, Ms. Miele received an email and attached "Julie Dalessio file" via email from Karen Holloway and forwarded the records to the public records office on September 25, 2015 and again on October 8, 2015. See, UW002003, UW002455-UW002952.

15. Cheryl Manekia
Program Operations Specialist, Payroll (since August 2014)
cmanekia@uw.edu
Box 359555
4333 Brooklyn Avenue NE
Seattle, WA 98195
(206) 543-8000

Ms. Manekia reported to public records staff Alison Swenson on April 25, 2016 that she searched and located no records of employment verification requests for Julie Dalessio or records responsive to PRR-16-00283. In September of 2015, Ms. Manekia search for and forwarded records responsive to PRR-2015-00570 from the payroll office to Ms. Swenson in the public records office. UW000392, UW001992-UW001994

16. Odessah Visitacion
Human Resources Specialist (since July 2013)
206 598-9323
UW Medicine HR - Business Operations
Box 359421
Seattle, WA 98195

Ms. Visitacion provided a certification on April 27, 2016 that she searched but located no records responsive to Public Records Request 16-00283 in the Medical Centers Human Resources Department files. UW001995.

17. Paola M. Quinones
Former Assistant to the Vice President (August 2014-February 2017)
Last Known Address:
16230 5TH AVE SE
BOTHELL, WA 98012

On October 9, 2015, Ms. Quinones forwarded records responsive to PRR-2015-570 from Campus Human Resources to Ms. Swenson in the public records office. On October 14, 2015, Ms. Quinones forwarded documents responsive PRR-2015-570 located in the Benefits Office to Ms. Swenson in Public Records. On October 21, 2015, Ms. Quinones forwarded a document received from the DSO office responsive PRR-2015-570 to Ms. Swenson in public records. See, UW002001-UW002011.

On December 6, 2016, Ms. Quinones forwarded records responsive to PR-2016-

00760 to public records analyst Andrew Palmer. On December 20, 2016, Ms. Quinones reported to Mr. Palmer that DSO did not have documents responsive to the request. UW002415-UW002420.

On April 27, 2017, Ms. Quinones reported to public records staff that the Campus Human Resources Office did not locate any records responsive to PRR-16-00283. UW001996-UW001998.

18. Matt Maria
Former Program Coordinator, Laboratory Medicine (July 2013-December 2016)
Last Known Address:
5507 17TH AVE S
SEATTLE, WA 98108

Records reflect former employee Matt Maria requested a box from Records Management Services archives (#43135) on or about September 21-22, 2015 that contained Plaintiff's department file from Laboratory Medicine in response to PRR-2015-00570. The box was returned to archives on or about October 18, 2016. Records Management Services records reflect box #43135 contained "Personnel Records Terms, A-F, Year 2003". UW002966- UW002995.

Records reflect Mr. Maria also requested box #43135 from Records Management Services archives (#43135) on or about December 5, 2016, that the box was checked out of archives December 12, 2016 for delivery and returned to archives December 15, 2016. UW002966- UW002995.

Records reflect that Mr. Maria may have originally sent the department files located in box #3 ("personnel records Terms A-F 2003") from the Lab Medicine Department to Records Management Storage in 2005. UW002960-UW002964.

19. Tamara Schmautz
Manager of Program Operations, Virology Division Administrator, Lab Medicine (since October 2013)
Box 358080
1100 Fairview Ave N
Seattle, WA 98109-4433
tschmaut@uw.edu

Records reflect Ms. Schmautz was asked to locate records responsive to PR-2016-00760 and that she communicated to Amy Robles on December 5, 2016 that her division did not have any records regarding Plaintiff. UW002412-UW0014.

20. Steven Durant
Former Human Resources Department Manager/Administrator (November 2015-March 2017)
Last Known Address:

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6055 35TH AVENUE, SW # 207
SEATTLE, WA 98126

Records reflect Mr. Durant was copied on some public records search requests related to PR-2016-00760 (Dalessio). See, UW002032-UW002040, UW002296-UW002298

21. Karen Holloway
Former Associate Administrator, Dept. of Laboratory Medicine (retired January 2017)
Last Known Address:
6735 N. Talman Ave.
Chicago, IL 60645

Records reflect on September 17, 2015, Karen Holloway reported to Ms. Miele that she submitted the request to a Program Coordinator (presumably Matt Maria) so the records could be retrieved from storage in archives. On September 25, 2015, Ms. Miele received an email and attached "Julie Dalessio file" via email from Karen Holloway and forwarded the records to the public records office on September 25, 2015 and again on October 8, 2015. See, UW002003, UW002455-UW002952.

Records reflect Ms. Holloway requested Plaintiff's department file from archives in December 2016 in response to Ms. Dalessio's PR-2016-760 request and subsequently forwarded a copy of Plaintiff's department file to Lauren Fischer on December 12, 2016. The documents were forwarded to Amy Robles, who uploaded them to the public records office. See, UW002032-002401. Records reflect Ms. Holloway located one more file related to Plaintiff when she was clearing out her office the last time upon retirement and she forwarded the documents to Ms. Robles, Mr. Durant, and Ms. Fischer on December 16, 2016, which was uploaded to the office of public records. UW00265-UW002299.

22. Jennifer Klohe
HR Specialist
klohej@uw.edu
1959 NE Pacific St.
Seattle, WA 98195
206 744-9229

Ms. Klohe forwarded a copy of a November 22, 2016 letter mailed to the Human Resources office from attorney Seth Rosenberg requesting a copy of Ms. Dalessio's personnel file on her behalf to the Public Records Office on November 28, 2016 in response to a request to locate University records related to Ms. Dalessio. UW001989-001990.

23. Lauren Fischer
Former Program Manager
Current: Assistant Director of Business Affairs, UW Medicine
Box 356480

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1 1705 NE Pacific St
2 Seattle, WA 98195
3 206 221-1894

4 Ms. Fischer may have been copied on some public records search requests and
5 passed on search requests from public records on to various departments.

6 24. Christine Taylor
7 c/o Jayne L. Freeman, defense counsel
8 Keating Bucklin & McCormack, Inc. P.S.
9 801 Second Ave., Suite 1201
10 Seattle, WA 98104
11 (206)623-8861

12 Ms. Taylor may have information and knowledge regarding the University of
13 Washington Records Management Services, and procedures for storing inactive documents,
14 retrieving and returning boxes containing stored documents, and related paperwork, and
15 located documents UW 2966-2995.

16 25. Marcelo Collantes
17 Interim Director Finance & Administration, UW Medicine, Lab Medicine—Clinical
18 Laboratory Administration
19 c/o Jayne L. Freeman, defense counsel
20 Keating Bucklin & McCormack, Inc. P.S.
21 801 Second Ave., Suite 1201
22 Seattle, WA 98104
23 (206)623-8861

24 Mr. Collantes may have knowledge and information regarding storage of inactive
25 Lab Medicine department files, including processes for archiving boxes of files off-site,
26 retrieval and interim storage of boxes containing inactive department files, and security and
27 access to stored records. See, documents UW2960-UW2965.

28 26. Daisy Rendorio
29 Manager of Program Operations, Dept. of Lab Medicine
30 c/o Jayne L. Freeman, defense counsel
31 Keating Bucklin & McCormack, Inc. P.S.
32 801 Second Ave., Suite 1201
33 Seattle, WA 98104
34 (206)623-8861

35 Ms. Rendorio may have information and knowledge regarding locating documents
36 UW2960-UW2965 reflecting the Department of Laboratory Medicine requesting archive
37 storage of two boxes of Lab Medicine personnel records, including “Box 3” containing
38 “Personnel Records A-F from 1/1/2003-12/31/2003” in May of 2005.

II. RULE 26(A)(1)(A)(II) A COPY—OR A DESCRIPTION BY CATEGORY AND LOCATION—OF ALL DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS THAT THE DISCLOSING PARTY HAS IN ITS POSSESSION, CUSTODY, OR CONTROL AND MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES, UNLESS THE USE WOULD BE SOLELY FOR IMPEACHMENT:

Disclosure of various documents does not reflect Defendants agreement as to whether certain information, evidence, or issues are actually relevant or material to claims or theories as advanced by Plaintiff or defenses necessary to respond to said claims. Defendants reserve the right to object to discovery related to matters outside the scope of FRCP 26, or immaterial to legal defenses and arguments upon which Defendants may rely to defend against claims and theories set forth in Plaintiff's First Amended Complaint.

Doc. No.	Description	Bates Range	Date Produced to Plaintiff in Litigation
1.	Plaintiff Julie Dalessio tort claim dated October 21, 2016	UW00001-00003	June 1, 2017
2.	PR-2015-00570 (Betz) Public Records Request 9.16.15 (for Dalessio documents) and related documents Produced: 11.20.2015 and 12.4.2015	UW00004-000392	June 1, 2017
3.	PR-2016-00218 (Dalessio) Public Records Request 3.25.2016 (for copies of documents released to Betz) and related documents Produced: 4.5.2016	UW000393-UW000778	June 1, 2017
4.	PR-2016-00283 (Dalessio) Public Records Request 4.16.2016 (for information re who accessed her records) and related documents Response: 4.27.16	UW000779-000787	June 1, 2017
5.	PR 2016-00760 Public Records Request (Dalessio) 11.09.2016 (for her entire personnel file and related records) and related records Produced: 1.26.2017 and	UW000788-001936	June 1, 2017

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Doc. No.	Description	Bates Range	Date Produced to Plaintiff in Litigation
	2.15.2017		
6.	2003 Settlement Agreement	UW001937-001940	June 1, 2017
7.	Plaintiff Julie Dalessio Summons & Complaint served April 3, 2017	UW001941-1980	June 1, 2017
8.	Correspondence between Plaintiff Julie Dalessio and the University	UW001981-001988	June 1, 2017

Document Name	Bates Range	
Dalessio atty duplicate PRR (UWHR) Ana Marie Keeney/Patricia Van Velsir, UWMC Human Resources	UW001989-UW001990	August 15, 2017
PRR #283-other correspondence (10 pp) Alison Swenson Odessah Visitacion Cheryl Manenkia Paola Quinones (on behalf of Mindy Kornberg)	UW001991-UW002000	August 15, 2017
PRR #570-other correspondence (31 pp) Alison Swenson Paola Quinones	UW002001-UW002031	August 15, 2017
PRR #760 - processing emails Andrew Palmer Lauren Fisher Karen Holloway Amy Robles	UW002032-UW002401	August 15, 2017
PRR #760-other correspondence (21 pp) Andrew Palmer Amy Robles Paolo Quinones	UW002402-UW002422	August 15, 2017
PRR #760-other correspondence (32 pp) Andrew Palmer Paola Quinones Amy Robles	UW002423-UW002454	August 15, 2017

PRR #760-processing emails - docs(combo)(498 pp) Andrew Palmer Jeanne Miele Kim Williams	UW002455-UW002952	August 15, 2017
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Karen Holloway		
RCW 42.56 glossary Alison Swenson/Andrew Palmer	UW002953-UW002959	August 15, 2017
Lab Med archive box requests (2015-2017) (6pp)	UW002960-UW002965	August 15, 2017
Rebecca Caulfield, Lab Medicine		
RMS archive processing (30 pp)	UW002966-UW002995	August 15, 2017
Christine Taylor, UW Medicine, RMS Archives		
WSHRC-EEOC documents (UWHR - UCIRO copies)	UW002996-UW003004	August 15, 2017
Ana Marie Keeney/Patricia Van Velsir, UWMC HR		

III. RULE 26(A)(1)(A)(IV): (III) A COMPUTATION OF EACH CATEGORY OF DAMAGES CLAIMED BY THE DISCLOSING PARTY—WHO MUST ALSO MAKE AVAILABLE FOR INSPECTION AND COPYING AS UNDER RULE 34 THE DOCUMENTS OR OTHER EVIDENTIARY MATERIAL, UNLESS PRIVILEGED OR PROTECTED FROM DISCLOSURE, ON WHICH EACH COMPUTATION IS BASED, INCLUDING MATERIALS BEARING ON THE NATURE AND EXTENT OF INJURIES SUFFERED

Not Applicable to Defendants.

IV. RULE 26(A)(1)(A)(IV) FOR INSPECTION AND COPYING AS UNDER RULE 34, ANY INSURANCE AGREEMENT UNDER WHICH AN INSURANCE BUSINESS MAY BE LIABLE TO SATISFY ALL OR PART OF A POSSIBLE JUDGMENT IN THE ACTION OR TO INDEMNIFY OR REIMBURSE FOR PAYMENTS MADE TO SATISFY THE JUDGMENT.

The University of Washington and its employees, agents, and students are covered for liabilities arising from negligent acts and or omissions committed in the course and scope of their University duties. This coverage is provided through a self-funded program established pursuant to RCW 28B20.250 et seq., and governed by the Standing Orders of the Board of Regents. The liability program provides unlimited coverage, operates on an occurrence basis, and applies at all approved sites of practice or education.

At Plaintiff's request, the University has also produced to Plaintiff copies of the afore-referenced Washington statute, Board of Regents Governance Standing Orders, Chapter 5 (outlining RCW 28B.20.250) and Executive Order No. 19 (Attorney General's

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1 Division-legal procedures involving the University and its personnel), and hereby produces
2 copies of 2018 correspondence to individual Defendants Palmer, Swenson, Saunders, and
3 Tapper (please note: the two versions of correspondence to Mr. Tapper reflect the original
4 correspondence that contained a mistake in the salutation, and the corrected version). See,
5 UW004452-UW))4461, previously produced to Plaintiff on July 12, 2018.

6 DATED: July 30, 2018

7 KEATING, BUCKLIN & McCORMACK, INC., P.S.
8

9 By: /s/ Jayne L. Freeman

10 Jayne L. Freeman, WSBA #24318

11 Special Assistant Attorney General for Defendants

12 800 Fifth Avenue, Suite 4141

13 Seattle, WA 98104-3175

14 Phone: (206) 623-8861

15 Fax: (206) 223-9423

16 Email: jfreeman@kbmlawyers.com
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27

DECLARATION OF SERVICE

I declare that on July 30, 2018, I caused a true and correct copy of the foregoing document to be served on the party listed below *via email*.

Attorney for Plaintiff

Mr. Joseph Thomas
14625 S.E. 176th St., Apt. N-101
Renton, WA 98058-8994
(206)390-8848
joe@joethomas.org

DATED: July 30, 2018

/s/ Jayne L. Freeman

Jayne L. Freeman